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Attorneys for Plaintiff ZooBuh, Inc.

FILED
U.S. DISTRICT COURT

2019 MAY 29 A 10:15

DISTRICT OF UTAH

BY: _____
DEPUTY CLERK

SEALED

**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

ZOOBUH, INC., a Utah Corporation

Plaintiff,

vs.

SAVICOM, INC., et al.

Defendants.

**THIRD APPLICATION FOR WRIT OF
EXECUTION**

UNDER SEAL PER ORDER OF COURT
[ECF 83]

Case No.: 2:17cv01098 JNP

Judge Jill N. Parrish

1. On April 4, 2019, this Court entered judgment against DG International Limited in the amount of \$3,003,600.00. *See* Default Judgment [ECF 82].

2. The amount due it \$3,003,550.00

3. The judgment debtor is:

DG International Limited
Suite 142, The Beehive
Rohais, St. Peter Port, Guernsey
GY1 3HT

4. I request that a *Writ of Execution* be issued directing the U.S. Marshal to seize and sell enough of the judgment debtor's property described below to satisfy the judgment. I request that the Writ be served on the people named in Paragraph 5 via mail.

5. I request that the Writ of Execution direct the U.S. Marshal to seize and sell the debtor's following personal property:

<i>Description</i>	<i>Estimated Value</i>	<i>Name & Address of anyone other than debtor claiming an interest</i>
<i>bootycallads.com</i> <i>icontroltraffic.com</i> <i>lbbill.com</i> <i>localbootyonly.com</i> <i>personalsmedialtd.com</i> <i>vl-bill.com</i>	<i>Unknown but less than the judgment amount</i>	<i>Virtual Landscape Limited</i> <i>Suite 102, Envoy House</i> <i>La Vranguie, St. Peter Port</i> <i>Guernsey, GY1 3EN</i>
<i>amateurvideosonline.com</i> <i>bill-ds.com</i> <i>bootycalldate.com</i> <i>c-cbill.com</i> <i>citascasuales.com</i> <i>clickconnectllc.com</i> <i>costaricareidence.com</i> <i>digitallandscapelimited.com</i> <i>digitalspherelimited.com</i> <i>digitalspheremedia.com</i> <i>digitaltagllc.com</i> <i>dlvrer.com</i> <i>dtbill.com</i> <i>dtf7.net</i> <i>gbnotifications.com</i> <i>gbtc1.com</i> <i>gonnacam.com</i> <i>hornyflirtfinder.com</i> <i>iou6.net</i> <i>lbnotifications.com</i> <i>lbnotify.com</i> <i>learnhowtogetanygirl.com</i> <i>localadulthookup.com</i> <i>localbooty.com</i> <i>localbootycams.com</i> <i>localbootylive.com</i> <i>lossuenoshouse.com</i> <i>lossuenosowners.com</i>		<i>Personals Media Limited</i> <i>Armory Building, Victoria Road</i> <i>Basseterre, Saint Kitts,</i> <i>00000, KN</i>

<i>md5s.net</i> <i>mrshub.com</i> <i>onlydtf.com</i> <i>onlydtfcams.com</i> <i>qdlvry.com</i> <i>r2d-international.com</i> <i>redirectsmart.com</i> <i>smtplvry.com</i> <i>unoclicky.com</i> <i>vl-ltd.com</i> <i>vllbill.com</i> <i>wc-bill.com</i> <i>wcbill.com</i> <i>web-connectllc.com</i> <i>wlibill.com</i> <i>xdatenotify.com</i> <i>xnotifications.com</i> <i>xnotify.com</i> <i>xpersonals.com</i> <i>xplpay.com</i>		
<i>Website content, images, customer accounts, accounts receivable, source code, computer code, databases, database content, database dumps, algorithms, and all other web based assets and intellectual property and good will (collectively "Virtual Assets") of the foregoing domains</i>	<i>Unknown but less than the judgment amount</i>	<i>Virtual Landscape Limited</i> <i>Suite 102, Envoy House</i> <i>La Vrangue, St. Peter Port</i> <i>Guernsey, GY1 3EN</i> <i>Personals Media Limited</i> <i>Armory Building, Victoria Road</i> <i>Basseterre, Saint Kitts,</i> <i>00000, KN</i>

6. Given that Defendant is a foreign entity and defaulted in this action, Plaintiff respectfully requests that the Court permit service of the Redacted Writ of Execution along with the Notice of Execution, Exemptions, and Right to a Hearing and Request for Hearing form via mail to the address identified on Defendant's websites which is:

DG International Limited
Suite 142, The Beehive
Rohais, St. Peter Port, Guernsey
GY1 3HT.

7. I have not included any non-public information in this document.

DATED this 20th day of May, 2019.

DURHAM JONES & PINEGAR, P.C

/s/ Jordan Cameron
Jordan K. Cameron
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

ZOOBUH, INC., a Utah Corporation

Plaintiff,

vs.

SAVICOM, INC., et al.

Defendants.

**WRIT OF EXECUTION RE THIRD
APPLICATION**

Case No.: 2:17cv01098 JNP

Judge Jill N. Parrish

TO THE UNITED STATES MARSHAL:

1. On April 4, 2019, this Court entered judgment against DG International Limited, LLC in the amount of \$3,003,600.00.

2. You are directed to seize and sell through auction enough of the judgment debtor's non-exempt property described in Paragraph 5 of the *Third Application for Writ of Execution* to satisfy that amount. Specifically,

Description	Estimated Value	Name & Address of anyone other than debtor claiming an interest
bootycallads.com icontroltraffic.com lbbill.com localbootyonly.com personalsmedialtd.com vl-bill.com	Unknown but less than the judgment amount	Virtual Landscape Limited Suite 102, Envoy House La Vrangue, St. Peter Port Guernsey, GY1 3EN
amateurvideosonline.com bill-ds.com bootycalldate.com c-cbill.com citascasuales.com clickconnectllc.com		Personals Media Limited Armory Building, Victoria Road Basseterre, Saint Kitts, 00000, KN

costaricareidence.com digitallandscapelimited.com digitalspherelimited.com digitalspheremedia.com digitaltagllc.com dlvrer.com dtbill.com dtf7.net gbnotifications.com gbtc1.com gonnacam.com hornyflirtfinder.com iou6.net lbnotifications.com lbnotify.com learnhowtogetanygirl.com localadulthookup.com localbooty.com localbootycams.com localbootylive.com lossuenoshouse.com lossuenosowners.com md5s.net mrshub.com onlydtf.com onlydtfcams.com qdlvry.com r2d-international.com redirectsmart.com smtpdlvr.com unoclicky.com vl-ltd.com vllbill.com wc-bill.com wcbill.com web-connectllc.com wlibill.com xdatenotify.com xdnotifications.com xdnotify.com xpersonals.com xplpay.com		
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Website content, images, customer accounts, accounts receivable, source code, computer code, databases, database content, database dumps, algorithms, and all other web based assets and intellectual property and good will (collectively "Virtual Assets") of the foregoing domains	Unknown but less than the judgment amount	Virtual Landscape Limited Suite 102, Envoy House La Vrangue, St. Peter Port Guernsey, GY1 3EN Personals Media Limited Armory Building, Victoria Road Basseterre, Saint Kitts, 00000, KN
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3. The Judgment Creditor shall serve, via mail, this Writ and all attachments on the people named in Paragraph 5 of the *Application for Writ of Execution*.

4. The Judgment Creditor shall serve, via mail, this Writ and all attachments on the Judgment Debtor via mail.

TO THE JUDGMENT DEBTOR (VIA MAIL): You are notified that federal and state exemptions may be available to you and that you have a right to seek a court order releasing as exempt any property specified in the Marshal's schedule from the levy.

DATED this ____ day of _____, 2019.

Clerk of the Court

RETURN

Date Received:

Date of Execution of Writ:

This writ was received and executed.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

NOTICE OF EXECUTION, EXEMPTIONS, AND
RIGHT TO A HEARING

PLEASE READ THIS NOTICE CAREFULLY
YOUR PROPERTY, BENEFITS, OR INCOME MAY BE TAKEN
TO PAY A CREDITOR

The attached *Writ of Execution* has been issued by this Court at the request of a judgment creditor (the Plaintiff) who sued you and got a judgment against you. This means that land or personal property owned by you may be taken by the Plaintiff to pay the judgment against you.

The law provides that certain property cannot be taken to pay judgments. Such property is said to be exempt. The following is a partial list of property that is or may be exempt.

1. A homestead whose value does not exceed the amount allowed under the law. (See Section 78-23-4 of the Utah Code, Annotated regarding the proper procedure to declare and file a homestead)
2. A motor vehicle used in trade or business up to the amount allowed by law
3. Tools of the trade up to the amount allowed by law
4. Social Security Benefits
5. Supplemental Security Income Benefits (SSI)
6. Veteran's Benefits
7. Unemployment Benefits
8. Worker's Compensation Benefits
7. Public Assistance (Welfare)
8. Alimony and/or Child Support
11. Certain Pensions
12. Part or all of the wages or other earnings from personal services
13. Certain household furnishings and appliances,
14. Certain musical instruments
15. Certain heirlooms

This is a **partial list** and other various property exemptions may be available under federal law or the Utah Exemption Statute (Section 78-23 of the Utah Code) for other possible exemptions.

There is no exemption solely because you are having difficulty paying your debts.

The above exemptions may not apply to judgments for alimony, support, or maintenance or to state or local taxes or to allowable claims listed in Utah Code Ann. Section 78-23-10.

If there is a co-owner of the property taken, you or the co-owner should request a hearing.

IF THE PROPERTY DOES NOT BELONG TO YOU, OR IF YOU ARE AWARE OF OTHER REASONS WHY THIS PROPERTY SHOULD NOT BE TAKEN, YOU OR THE OWNER OF THE PROPERTY MAY WANT TO CONSULT AN ATTORNEY.

Because of the execution, the sheriff or constable has seized your property and will deliver it to the Plaintiff or sell it.

If you believe that the Writ of Execution was issued improperly or you are entitled to an exemption, DO THE FOLLOWING IMMEDIATELY. You have a deadline of ten(10) days from the date the Plaintiff mailed or delivered this notice to you.

1. Check the appropriate box(es) in paragraph one of the attached "Request for a Hearing."
2. Sign your name in the space indicated and write the address where the Court Clerk is to notify you of the hearing.
3. Mail or take the "Request for Hearing" to the Court Clerk and to the Plaintiff or the Plaintiff's attorney within ten (10) days from the date this notice was mailed or delivered to you. Keep a copy for your records. The Court will set the matter for hearing and notify you. You have the right to a hearing within ten (10) days from the date the Court Clerk receives your claim. At the hearing in Court, you will have to prove that your property is exempt or the Writ of Execution was not properly issued. You should bring any documents which may help to prove your claim.

A KNOWINGLY MADE FALSE STATEMENT ON THE FORM MAY SUBJECT YOU TO CRIMINAL PENALTIES.

You may want to consult an attorney for advice or assistance concerning the hearing. If you do not come to Court at the designated time and prove that the execution was issued improperly or that your property is exempt, you may lose some of your rights.

If you do not request a hearing within the time specified above, but believe that the execution was issued improperly or that you are entitled to an exemption, you should consult an attorney.

UNITED STATES DISTRICT COURT
DISTRICT OF UTAH - CENTRAL DIVISION

ZOObUH, INC.

Plaintiff

vs.

SAVICOM, INC., et al.

Defendant

REQUEST FOR HEARING

Civil No. 2:17cv01098 JNP

1. Complete this paragraph if you claim the property executed upon is exempt:

☐ (a) The property which has been executed upon is exempt from execution because it is (Check the applicable box or boxes):

- ☐ Homestead up to the amount allowed by law
- ☐ A motor vehicle used in my trade or business and having a value below that allowed by law
- ☐ Tools of the trade
- ☐ Social Security Benefits
- ☐ Supplemental Security Income (SSI)
- ☐ Veterans' Benefits
- ☐ Unemployment Benefits
- ☐ Worker's Compensation
- ☐ Public Assistance (Welfare)
- ☐ Alimony or Child Support
- ☐ Pensions
- ☐ Wages or other earnings from personal services
- ☐ Owned by another person
- ☐ Only partly owned by me
- ☐ Certain tools of the trade below the value allowed by law
- ☐ Certain furniture and appliances
- ☐ Certain musical instruments
- ☐ Certain heirlooms
- ☐ Other (describe): _____

☐ (b) Check if applicable: I have attached copies of the documents that show my property is exempt.

2. Complete this paragraph if you believe the Writ of Execution was improperly issued:

☐

I believe that the writ of execution was issued improperly. (Explain)

☐

I claim ownership of all or part of the property taken and I am not one of the persons against whom a judgment has been entered.

☐

I do not own the property taken.

I REQUEST THAT THIS MATTER BE SET FOR A HEARING.

THE STATEMENTS MADE IN THIS REQUEST ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated this ____ day of _____, 20____

Signature

Name (printed or typed)

Mailing Address

UNITED STATES DISTRICT COURT
DISTRICT OF UTAH - CENTRAL DIVISION

ZOOBUH, INC.

Plaintiff

vs.

SAVICOM, INC., et al.

Defendant

REQUEST FOR HEARING

Civil No. 2:17cv01098 JNP

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- ☐ Unemployment Benefits
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- ☐ Public Assistance (Welfare)
- ☐ Alimony or Child Support
- ☐ Pensions
- ☐ Wages or other earnings from personal services
- ☐ Owned by another person
- ☐ Only partly owned by me
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- ☐ Certain furniture and appliances
- ☐ Certain musical instruments
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Dated this ____ day of _____, 20____

Signature

Name (printed or typed)

Mailing Address